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**BOISE**

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Environmental Services Manager

March 27, 2003

Ms. Rebecca Kane  
Environmental Protection Agency  
Office of Enforcement and Compliance Assurance, MC 2222A  
1200 Pennsylvania Avenue  
Washington, DC 20460

Subject: Environmental Compliance History Online Web (ECHO), Notice of  
Availability. FR Volume 67, No 224 and Volume 68 No. 20

FOIA(b)(7)(C), (b)(7)(D) - information withheld

Dear Ms. Kane:

Boise Cascade Corporation (Boise) wishes to submit comments on the above referenced Notice of Availability. This Notice relates to the EPA ECHO website that is currently in a trial period. Boise is a major manufacturer of pulp, paper and forest products and distributor of office supplies and equipment. Many Boise locations are listed in the ECHO database. We understand that this database is a compilation of information from EPA and other sources, including federal and state compliance information, state permits, and US census data. Enforcement and penalty information is represented for the past two years. While we find that the database is relatively easy to use, and the terms are fairly well explained, there are significant data quality concerns. We have the following comments and suggestions:

1. The Site's Data Are Misleading.

A review of the ECHO database for Boise Cascade Corporation sites provides information on a wide variety of locations. We reviewed the database using broad, then narrower search criteria to determine its ease of use, scope of results, and accuracy of the data. We found overall, that the ECHO database information is quite misleading. For example, using a broad search for "Boise" (our trade name) returned a listing for 196 sites. Most of these sites are not related to our company. Narrowing the search by SIC codes for major group 26 (Paper and Allied Industries) returned 19 sites. Fifteen of these sites are titled as "Boise Cascade" or a close derivative. A little over half (11) of these sites are active Boise locations. The rest are sites that have been closed or sold and operating under other names as long as 16 years ago, and one is an office building

with no known environmental issues. This approximately 50% confidence rate is very misleading for anyone utilizing the database to obtain Boise Cascade Corporation compliance information, even for a targeted search. Without detailed knowledge of the company, a review of the permits, emission summaries and compliance history for this targeted group would give at best, an inaccurate representation of Boise Cascade Corporation.

We also note that for broad searches, or a search that includes minor sources, a site is often listed solely due to the issuance of a RCRA identification number. In many cases, the RCRA identification is quite old and no longer used. EPA also made mention of this issue and noted that it could be misleading to presume that a site is active simply because it holds a hazardous waste identification number. It is suggested that this disclaimer be added as a footnote to the "Facility Permits and Identifiers" section.

Finally, the listing sections for the various media (air, water, hazardous waste summaries) indicate that the ECHO database contains information through March 2003. This appears to be misleading as the database cannot contain information up to the quarter that has not yet been completed. In many cases, the data are far from up-to-date. The compliance data, in particular, are suspect for reasons detailed below.

## 2. The Site's Data Are Wrong.

We understand that EPA incorporated existing information from a variety of sources, and that the database is very expansive. However, it is apparent that data quality is lacking. In particular, it is frustrating that the specific alleged violations are only generically explained. It is not possible for many entries, especially air items, to be verified for accuracy. For example, violations are simply termed "CAA violations", or "SIP violations," and it is not possible to see what event(s) may have caused these occurrences. It is suggested that more detail be provided for the listed violations, especially for air-related entries.

Based on our evaluation of the information in the ECHO site, we believe that much of the violation information is wrong. For example, we reviewed the six Boise Cascade Corporation facilities that were listed as being in current significant non-compliance or subject to an enforcement action in the past two years. In many cases, the ECHO database was in error.

- An entry for our wood products facility in Emmett, Idaho shows a significant Clean Air Act violation for the past eight quarters. This entry may be associated with an EPA enforcement action that alleged CAA violations at Emmett and several other Boise wood products sites. This enforcement action was settled in

May 2002, resolving all compliance issues. The Emmett site is not in current violation.

- At our St. Helens, Oregon pulp and paper mill, the ECHO database indicates a current unaddressed Clean Air Act significant non-compliance event that occurred over the past 5 months. We are not currently in violation and do not believe we were in violation during this time.
- Our Rogue Valley, Oregon plywood manufacturing site was listed as involved in an enforcement action within the last two years. It is not possible to get any information on this site, as a "no report" error message appears when site access is attempted. If this site is listed due to the EPA CAA enforcement initiative, this issue was resolved in May 2002.
- Our Oakdale Louisiana and Florien plywood sites are listed as having unresolved CAA violations over the past two years. These may be associated with the EPA enforcement initiative that was settled in May 2002. These locations are not in current violation.
- An entry for our plywood plant in Florien, Louisiana includes entries for a closed Boise sawmill (Fisher). A separate listing for the closed Fisher site lists a Title V permit that has been terminated for over five years.
- As mentioned above, the search results return many sites that are not Boise Cascade Corporation locations. These non-Boise sites include information on TRI releases, alleged violations and permit information. These data are not associated with current Boise operations and are incorrectly listed.

In most of the cases where a Boise Cascade Corporation location was listed in significant violation in the ECHO database, we believe the listing is incorrect. The air-related items seem to be especially outdated or wrong. A person reviewing this database for our company would get an erroneous view of our compliance status.

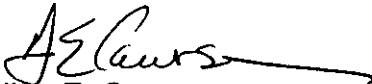
We appreciate that EPA must rely on the quality of data imported or linked from other sources for their ECHO site and that much of the data originates with the states. However, it is apparent that data quality in several state systems is lacking. The data typically appear to have incorrect periods for time in violation or show enforcement actions where none have occurred. The lack of good data, especially in describing compliance history, is particularly disturbing. We strongly believe that none of the compliance data should be placed into the public database until it is confirmed by the source. This type of confirmation-review of information, including compliance information, is already employed by investor organizations such as Innovest. We urge EPA to allow the regulated community the opportunity to confirm compliance information.

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In summary, we find the organization of the database to be satisfactory and relatively easy to use. We find that searching for specific locations yields many, and in some cases, most sites that have no current relation to our company. Further, and of greatest concern, we find that the compliance data is often wrong or out-of-date. The compliance data must not be placed in the final site until it is corrected.

Should you have any questions, please contact me at (208) 384-6348.

Sincerely,

  
Allan E. Cawrse  
Environmental Services Manager

Cc:  
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